Bob Holden, Governor • Stephen M. Mahfood, Director

DEPARTMENT OF NATURAL RESOURCES

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December 22, 2004

CERTIFIED MAIL – 7002 0860 0007 6968 1367 RETURN RECEIPT REQUESTED

Mr. Joseph Haake Group Manager The Boeing Company Dept. 464C, Bldg. 220 Mail Code S221-1400 P.O. Box 516 St. Louis, MO 63166-0516

RE: Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) Report Boeing Facility, Hazelwood, Missouri, Permit # MOD00818963

Dear Mr. Haake:

The Missouri Department of Natural Resources' Hazardous Waste Program (HWP) has completed review of the revised, consolidated final RFI Report dated December 2004. The RFI Report adequately addresses the comments and concerns previously raised by the HWP and is hereby approved. Please submit the minor RFI Report additions that were discussed during the December 8, 2004, meeting between the HWP, Boeing, and the city of St. Louis Airport Authority.

Boeing is reminded that this RFI approval presumes that two issues discussed in the HWP's November 23, 2004, comment letter will be addressed in the Risk Assessment and/or Corrective Measures Study (RA/CMS). One issue relates to the areas where the extent of contamination was not completely defined to the investigative threshold levels specified in the RFI Work Plan. To reiterate previous discussions between the HWP and Boeing, it needs to be understood that following development of site-specific clean-up levels, additional contaminant delineation may be necessary in some areas as part of the CMS. The second issue relates to Coldwater Creek. The HWP understands that the issues associated with Coldwater Creek will be addressed in the RA.

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As you know, the next major step in the corrective action process will be Boeing's preparation of a CMS to evaluate viable remedial alternatives and propose a preferred final remedy. The HWP expects to provide comments to Boeing in the near future regarding the draft CMS Work Plan outline that was presented by Boeing during the above-referenced meeting. In the meantime, the HWP is continuing its review of the previously-submitted RA. The HWP also awaits Boeing's submission of an interim measure work plan(s) in relation to potential focused removal actions, soil gas sampling, pilot study activities, and/or interim management of excavated soils generated during construction and utility-related activities.

If you have any questions or require any additional information, please do not hesitate to contact Ms. Jill Bruss of my staff at the Missouri Department of Natural Resources, HWP, P.O. Box 176, Jefferson City, MO 65102-0176, or by phone at (573) 751-3553.

Sincerely,

HAZARDOUS WASTE PROGRAM

Robert K. Morrison, P.E. Chief, Permits Section

RKM:jbm

c: Ms. Joletta Golik, Airport Authority
Mr. Jeremy Johnson, United States Environmental Protection Agency Region VII

St. Louis Regional Office